

Hazardous Waste Inspection Report  
Generators - Part A

*Non-Hard hat*

*TCLP testing required  
met.  
Land Disposal - Met*

Date of inspection June 3, 1991 Time start 12:50 p.m. Time finish 14:10 p.m.  
Name of inspector James J. Young  
Company, installation name Westfield Tanning Co.  
Location Westfield  
County 1106A Municipality Westfield Borough  
Identification number PAD 003051802  
Name of responsible official MR. DAVID MURDOCK  
Title President of Westfield Tanning  
Mailing address 360 Church Street Westfield, PA  
Area code and telephone number 814-367-5951  
Name of person interviewed MR. KEITH KRAUS  
Title Environmental Manager  
Mailing address (if different from above) Same  
Area code and telephone number Same

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR  
b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim  
c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal  
d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

- a. 90± kg./mo.  
b. 1100± kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
<u>0001</u>	<u>Petro-Chem Processing</u>	<u>Detroit MI, Incineration</u>

Regional Office [Redacted] - EPA Field

**1-Non-Compliance, 2-Compliance, 3-Not Applicable, 4-Not Determined**

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Hazardous Waste Inspection Report  
Land Disposal Restriction Supplemental Checklist

Westfield Tanning  
PAD 003051802  
June 3, 1991

1-No Violation Observed				2-Not Applicable	3-Not Determined	4-Non-Compliance
Status				REQUIREMENT	Citation 40 CFR Part 268	
1	2	3	4			
✓				<b>Generators</b>		
	✓			Notification sent with shipments of wastes that do not meet treatment standards.	7(a)(1)	
	✓			Notification and certification sent with shipments of wastes meeting treatment standards.	7(a)(2)	
✓				Dilution not used as a substitute for treatment.	3	
✓				Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.	7(a)(5), (a)(6)	
	X			<b>Storage Facilities</b>		
	✓			Facility verifies generators classification of waste in accordance with waste analysis plan.	25 Pa Code 265.13(c)	
	✓			Containers marked to identify contents and accumulation date.	50(a)(2)	
	✓			Notification sent with shipments of wastes that do not meet treatment standards.	7(a)(1)	
	✓			Notification and certification sent with shipments of wastes meeting treatment standards.	7(a)(2)	
	✓			Facility maintains records of documents produced pursuant to LDR requirements.	7(a)(6)	
	X			<b>Treatment Facilities, including PBR and RRR Facilities</b>		
	✓			Dilution not used as a substitute for treatment.	3	
	✓			Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.	7(b)	
	✓			Certification and/or notification sent with shipments of waste.	7(b)(4), (b)(5), (b)(6)	
	X			<b>Land Disposal Facilities</b>		
	✓			Facility tests wastes received to assure compliance with applicable treatment standards.	7(c)(2)	
	✓			Facility land disposes of restricted waste only if it meets applicable treatment standard.	40	
	✓			Facility retains copies of generator notifications and certifications.	7(c)(1)	

Date of Inspection June 3, 1991 Identification Number PA0003051802  
 Company/Facility/Site Name Westfield Tanning Co. (SMALL QUANTITY GENERATOR)

- This facility generates (D001) hazardous wastes
- Consent Agreement is pending final signatures to be submitted to the department and settlement fees for violations noted on March 27, 1991.
- ⇒ Hazardous wastes were received by Westfield Tanning from E.H. Hall Co Inc. (D001) by way of an unlicensed transporter and without a manifest. E.H. Hall is currently closed and production equipment is at the Westfield Tanning Co. Site. Drums were shipped for disposal w/ <sup>E.H. Hall Trans</sup> manifest
- Westfield Tanning Co. is a small quantity generator
- Drum storage area was checked. less than 2 full drums were in storage. Labels were on drums.
- Accumulation dates were on drums.
- No violations were noted at this time. Facility appears to be in compliance

weather = 75°F, clear sunny, variable winds

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were observed during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification may be forthcoming, confirming any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature)

*Keith Jones*

Date

6/3/91

Inspector (signature)

*James J. Young*

Date

June 3, 1991

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Bureau of Waste Management  
200 Pine Street  
Williamsport, Pennsylvania 17701-6510

April 18, 1991

Manifest Discrepancy  
Westfield Tanning Company  
ID# PADG03051802  
Westfield Borough, Tioga County

Mr. David Murdock, President  
Westfield Tanning Company  
360 Church Street  
Westfield, PA 16950

NOTICE OF VIOLATION

Dear Mr. Murdock:

On March 27, 1991, an inspection was conducted at the above referenced facility with Mr. Keith Kraus. At that time it was determined that on February 26, 1991, seven drums of hazardous waste had been shipped from the E. H. Hall Company in Williamsport, Pennsylvania, to the Westfield Tanning Company in Westfield Borough, Tioga County, without a manifest. The waste was not reused, recycled or reclaimed at the Westfield Tanning Company. The E. H. Hall Company and Westfield Tanning are parts of the same corporate entity.

On March 5, 1991, the seven drums of hazardous waste stored at the Westfield Tanning Company were shipped from the Westfield Tanning Company to Petro Chem Processing in Detroit, Michigan, using manifest #MI2167751. E. H. Hall, 2605 Reach Road, Williamsport, Pennsylvania, was listed as the generator of the waste on the manifest. Since the waste material was generated by E. H. Hall of Williamsport, the material should have been shipped from that location and the manifest prepared and signed by E. H. Hall.

Storage of hazardous waste which was generated at another facility requires a permit from the department. Failure to obtain a permit prior to accepting hazardous waste for treatment, storage or disposal and failure to prepare a manifest in accordance with the instructions supplied with the manifest are violations of the Pennsylvania Solid Waste Management Act, the Act of July 7, 1980, 35 P.S. §§6018.403, 6018.610 and Chapters 261.41(b)(5), 262.20 and 264 of the Rules and Regulations of the department.

This Notice of Violation does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any or all violations of law arising prior to or after the issuance of this Notice of Violation or the conditions upon which this Notice of Violation was based, nor shall this Notice of Violation be construed so as to waive or impair the rights of the Department of Environmental Resources heretofore or hereafter existing.

Mr. David Murdock, President  
Westfield Tanning Company  
Page 2  
April 18, 1991

You should contact Mr. Curt White at (717) 327-3653 within fifteen (15) days of receipt of this Notice of Violation to discuss settlement procedures. If you have any questions concerning the above, please feel free to call Jim Young at (717) 662-4606.

Very truly yours,

Steven J. Dunkleberger  
Compliance & Monitoring Manager

SJD/bls

cc: File (thru GH)  
Field  
Central Office  
EPA  
Steve Dunkleberger (CW)  
Dennis Wolfe

Date Originated: 5/9/91

Date Received:

To/From: Martin H. Sokolow, Jr., Chief  
Central Region Litigation

From/To: R. Curt White, Jr.  
Bureau of Waste Management  
Williamsport Regional Office

Through: Steven J. Dunkleberger  
Bureau of Waste Management

*Now. Handhen*

Regional Office Contact: Curt White, PA Net 8-465-3431

Type of Document: Consent Assessment of Civil Penalty

Company/Responsible Individual Name: Westfield Tanning Company

Address (including Township/County): 360 Church Street, Westfield, PA 16950,  
Westfield Borough, Tioga County

Applicable ID/Permit Numbers: PAD003051802

Nature of Violation: Accepting hazardous waste without an accompanying Manifest.

Attorney Signature Requested: \_\_\_\_\_

Attorney Action Requested (Specify): Review and approve standard format Consent

Assessment of Civil Penalty

Other Relevant Information: \_\_\_\_\_

\*\*\*\*\*

Date Returned:

Date Received:

Assigned Attorney: \_\_\_\_\_

Legal ID Number: \_\_\_\_\_

cc: Regional Director  
Richard Bittle  
Steve Dunkleberger  
Central Office  
~~EPA~~  
Field  
File

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES

IN THE MATTER OF:

Westfield Tanning Company : Hazardous Waste Violations  
Westfield Borough :  
Tioga County :

CONSENT ASSESSMENT OF CIVIL PENALTY

NOW, this 12<sup>th</sup> day of June, 1991, the Commonwealth of Pennsylvania, Department of Environmental Resources ("Department"), has determined the following findings of fact:

- A. The Department is the agency with the duty and authority to administer and enforce the Solid Waste Management Act, Act of July 7, 1980, P.L. 380, as amended, 35 P.S. §6018.101 et seq. ("SWMA"), and the rules and regulations of the Environmental Quality Board adopted thereunder.
- B. Westfield Tanning Company ("Westfield"), a wholly owned subsidiary of E.H. Hall, Inc. ("Hall"), is a Pennsylvania corporation with an ID# PAD003051802 and maintains a business address of 360 Church Street, Westfield, PA 16950. Westfield owns and operates a leather tanning facility located in Westfield, PA ("plant").
- C. During an inspection on March 27, 1991, the Department determined, and Westfield agrees, that Westfield caused or allowed the following violations:
  - 1. On March 27, 1991 the Department conducted an inspection at the Westfield plant. The inspection found that 7 55-gallon drums of unidentified waste, which were generated by Hall at the Williamsport facility, were transported to the Westfield plant by Earl's Transfer of Sabinsville, PA. on or about February 26, 1991. The 7 drums of waste were not identified or labeled as to the contents prior to shipping. On March 5, 1991, the 7 drums of waste, mentioned above, were shipped out from the Westfield plant as a D001 hazardous waste by Tonowanda Tank Transport of New York under the Michigan uniform hazardous waste manifest no. MI 2167751. As the result of the above action and conditions, Hall has caused or allowed the following violations:
    - a. Earl's Transfer is not licensed to transport hazardous waste. In accepting hazardous waste from an unlicensed transporter, Westfield has violated 25 Pa. Code §264.11(a).
    - b. In accepting hazardous waste from an offsite source without an accompanying manifest, Westfield has violated 25 Pa. Code §264.71.
- D. The violations described in Paragraph C constitute unlawful conduct and public nuisance pursuant to §§610 and 601 of the SWMA, 35 P.S. §§6018.610 and 6018.601.



- E. Section 605 of the Solid Waste Management Act, 35 P.S. §6018.605, provides that the Department may assess a civil penalty of up to TWENTY FIVE THOUSAND DOLLARS (\$25,000.00) per day for each violation of the Solid Waste Management Act and the rules and regulations issued pursuant thereto.
- F. After complete negotiations in the matter between the parties hereto, the Department and Westfield agree to a settlement of the Department's claims for civil penalties for the violations identified in Paragraph C herein as follows:
1. Pursuant to the Department's authority under Section 605 of the Solid Waste Management Act, supra, 35 P.S. §6018.605, a Civil Penalty in the amount of ONE THOUSAND DOLLARS (\$1,000.00) is hereby assessed against and agreed to by Westfield. Payment of this Civil Penalty shall be made as follows: Submittal of a certified check or the like made payable to the "Commonwealth of Pennsylvania, Solid Waste Abatement Fund", and forwarded to Richard L. Bittle, Regional Environmental Protection Manager, Bureau of Waste Management, Pennsylvania Department of Environmental Resources, 200 Pine St., Williamsport, PA 17701-6510.
  2. Westfield hereby consents to this Civil Penalty Assessment issued pursuant to Section 605 of the SWMA, supra, 35 P.S. §6018.605 and waives its right to appeal from this Assessment which rights are available pursuant to Section 4 of the Environmental Hearing Board Act, the Act of July 13, 1988, P.L. 530, 35 P.S. §7514, the Administrative Agency Law, the Act of June 4, 1945, P.L. 1388, as amended, 2 Pa. C.S. §103(a) and Chapters 5A and 7A.
- G. By entering into this Consent Assessment of Civil Penalties, the Department only waives its right to bring an action for civil penalties for the specific violations set forth in Paragraph C herein for the dates set forth therein. Nothing herein shall be construed to imply that the Department waives any other rights which it may have concerning said violations or relieves Westfield from any future liability for environmental damages resulting from the activities described herein.

FOR WESTFIELD TANNING COMPANY:

The undersigned states, subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authority, that he/she is authorized to execute Agreement on behalf of Westfield.

David C. Murdoch 5/31/91  
Name Date

PRESIDENT  
Title

Annis E. Thayer 5/31/91  
Name Date

Secy.  
Title

FOR THE DEPARTMENT OF  
ENVIRONMENTAL RESOURCES:

Richard L. Bittle 6/10/91  
Richard L. Bittle Date  
Regional Environmental Protection  
Manager

APPROVED AS TO FORM AND LEGALITY:

Kurt J. Weist 6/12/91  
Attorney for the Commonwealth Date

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Hazardous Waste Inspection Report  
Generators - Part A

Date of inspection March 27 1991 Time start 13:00 Time finish 17:00  
 Name of inspector JAMES I Young  
 Company, installation name Westfield Tanking Company (Div. of E.M. Hall Co)  
 Location Westfield, Pa.  
 County TIOGA Municipality Westfield Borough  
 Identification number PA0 003051802  
 Name of responsible official Mr. David Murdock  
 Title President  
 Mailing address 360 Church Street Westfield, Pa.  
 Area code and telephone number 814-367-5951  
 Name of person interviewed Keith Kraus  
 Title Environmental Manager  
 Mailing address (if different from above) Same  
 Area code and telephone number Same

1. Current waste handling method:

- |    |  |                                     |                                   |  |                                  |
|----|--|-------------------------------------|-----------------------------------|--|----------------------------------|
| a. | <input type="checkbox"/> On-site             | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal            | <input type="checkbox"/> PBR     |
| b. | <input type="checkbox"/> On-site             | <input type="checkbox"/> use,       | <input type="checkbox"/> reuse,   | <input type="checkbox"/> recycle,            | <input type="checkbox"/> reclaim |
| c. | <input checked="" type="checkbox"/> Off-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input checked="" type="checkbox"/> disposal |                                  |
| d. | <input type="checkbox"/> Off-site            | <input type="checkbox"/> use,       | <input type="checkbox"/> reuse,   | <input type="checkbox"/> recycle,            | <input type="checkbox"/> reclaim |

2. Amount of hazardous waste produced:

- a. 10 ± (New Process) kg./mo.  
 b. 120 ± kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
<u>D001</u>	<u>Petro Chem Processing</u>	<u>Detroit MI Incinerate</u>

Regional Office  
Central Office  
EPA

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# Hazardous Waste Inspection Report

Generators - Part B

Westfield Tanning Co.

1-Non-Compliance, 2-Compliance, 3-Not Applicable, 4-Not Determined

Compliance Status				REQUIREMENT	Chapter Citation
1	2	3	4		75.262
	✓			Identification number	(c)(1)
	✓			Hazardous waste shipments offered only to licensed transporters	(c)(4)
		✓		Authorization received from TSD facility for wastes shipped off-site	(d)
		✓		PA manifest used for intrastate shipments	(e)(2)
	✓			Disposer state manifest or EPA format manifest used for out-of-state shipments	(e)(3)
✗				Manifests filled out properly and completely	(e)(7) . 20
			✓	Manifests routed properly and within time limits (7 days)	(e)(14) or (15)
	✓			Proper U.S. DOT shipping containers or packages	(f)(1)(i)
	✓			Shipping containers marked and labeled according to U.S. DOT	(f)(1)(ii)
	✓			Containers of 110 gal, or less marked with required PA label	(f)(1)(iii)
			✓	Placards offered to transporter	(f)(2)
	✓			Wastes accumulated on-site for less than 90 days	(g)(1)(i)
	✓			Wastes stored in proper containers and properly marked and labeled	(g)(1)(ii)
	✓			Containers managed in accordance with 75.265(q)(1)-(9)	(g)(1)(iii)
	✓			Containers clearly marked with accumulation date and visible for inspection	(g)(1)(iv)
	✓			Records retained at designated location for 20 years	(h)
		✓		Quarterly reports submitted to the Department	(i)
		✓		Exception reporting procedures followed	(j)
		✓		Hazardous waste disposal plan, if required	(l)
		✓		Spill reporting procedures followed	(m)(1)
		✓		Preparedness, Prevention and Contingency Plan and implemented	(m)(5)
		✓		Special requirements followed for international shipments	(o)
		✓		On the job or classroom personnel training program [75.265(f)]	(g)(1)(6)
		✓		Drum accumulation area inspected & inspection logged weekly as per 75.265(q)(5)	(g)(1)(iii)

Inspection Report Comments

Date of Inspection March 27, 1991 Identification Number PA0003057802  
Company/Facility/Site Name E.H. Hall Company / Westfield Tanning Company

- This facility became a small quantity generator of D001 waste about January. The processing equipment was installed between August 1990 and January. Butyl-Rubber with a solvent based carrier is used to weather proof leather soles. The spent residue is manifested to Petro Chem Processing Detroit, MI.
- During the process move of materials and equipment from the E.H. Hall facility in Williamsport Pa., 7 drums of waste were shipped to the Westfield facility. These were included in a 10,000# shipment of equipment transported by EARL Transfer on Feb 26, 1991. The drums were not labeled or marked and EARL transfer was not told they were waste, only part of the materials to deliver to Westfield Tanning Co.
- Westfield Tanning received the material and scheduled shipment to Petro Chem Processing through Tonawanda Tank Transport NYD 097644801. The material was physical manifested from Westfield Tanning; but Generated by E.H. Hall in Williamsport and E.H. Hall was itemized as the generator on the manifest document (MI 2167751)

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature) Keith Sauer

Date March 27, 1991

Inspector (signature) James J. Young

Date March 27, 1991

Page 3 of 4

Inspection Report Comments

Date of Inspection March 27, 1991 Identification Number PAD 003051802  
Company/Facility/Site Name EH Hall / Westfield Tanning Company

- Westfield Tanning Co. has less than 2 drums of D001 waste on site.
- This facility has shipped some paint wastes and epoxy wastes that were off-spec materials and no longer useable during March 1991. These materials were not generated by or used in any process. They were warehoused and became aged and unuseable.

Weather: 50°F, cloudy, light showers.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve as a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature)

*[Signature]*

Date

March 27, 1991

Inspector (signature)

*[Signature: James J. Young]*

Date

March 27, 1991

Page 4 of 4

Hazardous Waste Inspection Report  
Generators - Part A

T.C. L.P.  
Small Quantity Generators

Date of inspection MARCH 12, 1991 Time start 10:20 A.M. Time finish 15:00 p.m.  
 Name of inspector JAMES J. YOUNG  
 Company, installation name Westfield Tanning Company  
 Location 360 Church Street Westfield, PA  
 County Tioga Municipality Westfield Borough  
 Identification number PAD 003051802  
 Name of responsible official Mr. David Murdock  
 Title President of Westfield Tanning Company  
 Mailing address 360 Church Street Westfield, PA.  
 Area code and telephone number 814-367-5951  
 Name of person interviewed Mr. Keith Kraus - Mr. Tony Volante  
 Title Environmental Manager - Chemist  
 Mailing address (if different from above) same  
 Area code and telephone number same

1. Current waste handling method:

- |    |  |                                     |                                   |  |                                  |
|----|--|-------------------------------------|-----------------------------------|--|----------------------------------|
| a. | <input type="checkbox"/> On-site             | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal            | <input type="checkbox"/> PBR     |
| b. | <input type="checkbox"/> On-site             | <input type="checkbox"/> use,       | <input type="checkbox"/> reuse,   | <input type="checkbox"/> recycle,            | <input type="checkbox"/> reclaim |
| c. | <input checked="" type="checkbox"/> Off-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input checked="" type="checkbox"/> disposal |                                  |
| d. | <input type="checkbox"/> Off-site            | <input type="checkbox"/> use,       | <input type="checkbox"/> reuse,   | <input type="checkbox"/> recycle,            | <input type="checkbox"/> reclaim |

2. Amount of hazardous waste produced:

- a. 10 kg./mo.  
 b. \_\_\_\_\_ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
<u>0001</u>	<u>None shipped yet.</u>	

Regional Office  
Central Office

Field  
EPA

# Hazardous Waste Inspection Report

## Generators — Part B

PA0003051802

1—No Violation Observed				2—Not Applicable	3—Not Determined	4—Non-Compliance
Status				REQUIREMENT		Chapter Citation
1	2	3	4			75.262
✓				Hazardous waste determination, copies available		(b)
✓				Identification number		(c)(1)
		✓		Hazardous waste shipments offered only to licensed transporters		(c)(4)
		✓		Authorization received from TSD facility for wastes shipped off-site		(d)
		✓		PA manifest used for intrastate shipments		(e)(2)
		✓		Disposer state manifest or EPA format manifest used for out-of-state shipments		(e)(3)
		✓		Manifests filled out properly and completely		(e)(7)
		✓		Manifests routed properly and within time limits (7 days)		(e)(14) or (15)
✓				Proper U.S. DOT shipping containers or packages		(f)(1)(i)
✓				Shipping containers marked and labeled according to U.S. DOT		(f)(1)(ii)
✓				Containers of 110 gal. or less marked with required PA label		(f)(1)(iii)
		✓		Placards offered to transporter		(f)(2)
✓				Wastes accumulated on-site for less than 90 days		(g)(1)(i)
✓				Wastes stored in proper containers and properly marked and labeled		(g)(1)(ii)
✓				Containers managed in accordance with 75.265(q)(1)–(9)		(g)(1)(iii)
✓				Containers clearly marked with accumulation date and visible for inspection		(g)(1)(iv)
✓				Records retained at designated location for 20 years		(h)
		✓		Quarterly reports submitted to the Department		(i)
	✓			Exception reporting procedures followed		(j)
	✓			Hazardous waste disposal plan, if required		(l)
	✓			Spill reporting procedures followed		(m)(1)
		✓		Preparedness, Prevention and Contingency Plan and implemented		(m)(5)
	✓			Special requirements followed for international shipments		(o)
	✓			On the job or classroom personnel training program [75.265(f)]		(g)(1)(6)
	✓			Drum accumulation area inspected weekly as per 75.265(q)(5)		(g)(1)(iii)



# Hazardous Waste Inspection Report

## Land Disposal Restriction Supplemental Checklist

PA000 3051802

1-No Violation Observed				2-Not Applicable	3-Not Determined	4-Non-Compliance
Status				REQUIREMENT		Citation
1	2	3	4			40 CFR Part 268
	✓			<b>Generators</b>		
	✓			Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)
	✓			Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)
	✓			Dilution not used as a substitute for treatment.		3
	✓			Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.		7(a)(5), (a)(6)
	✓			<b>Storage Facilities</b>		
	✓			Facility verifies generators classification of waste in accordance with waste analysis plan.		25 Pa Code 265.13(c)
	✓			Containers marked to identify contents and accumulation date.		50(a)(2)
	✓			Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)
	✓			Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)
	✓			Facility maintains records of documents produced pursuant to LDR requirements.		7(a)(6)
	✓			<b>Treatment Facilities, including PBR and RRR Facilities</b>		
	✓			Dilution not used as a substitute for treatment.		3
	✓			Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.		7(b)
	✓			Certification and/or notification sent with shipments of waste.		7(b)(4), (b)(5), (b)(6)
	✓			<b>Land Disposal Facilities</b>		
	✓			Facility tests wastes received to assure compliance with applicable treatment standards.		7(c)(2)
	✓			Facility land disposes of restricted waste only if it meets applicable treatment standard.		40
	✓			Facility retains copies of generator notifications and certifications.		7(c)(1)

Bureau of Waste Management  
Inspection Report Comments

SMALL Quantity Genera

Date of Inspection March 12, 1991 Identification Number PAP003051802  
Company/Facility/Site Name Westfield Tanning Company

- This facility started generating hazardous wastes this year. They produce a spent-butyl rubber/kerosene sludge from a dip tank process that is used to weather proof sole leather. (P001-Flash point  $\approx 100^{\circ}\text{F}$ )
- No wastes have been shipped off-site yet. The facility has generated 20 gallons and it is stored in a marked drum in a secure drum storage area.
- ID. number was applied for through EPA, facility was informed to use the number that was assigned to the previous owner of the Tannery complex (Eberle tanning)
- No spills have occurred here.
- No manifests were on-site as no wastes have been shipped yet.

Sunny -  $45^{\circ}\pm\text{F}$ , variable winds

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

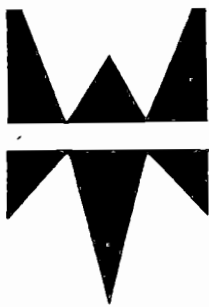
Person Interviewed (signature) Keith Lewis

Date 3/12/91

Inspector (signature) James J. Young

Date March 12, 1991

Page 4 of 4



# WESTFIELD TANNING COMPANY

February 22, 1991

EPA Region III  
Ms Lois Powell  
841 Chesnut Building  
Philadelphia, PA 19107

RECEIVED  
PA SECTION  
MAR 14 1991  
EPA, R3

Dear Ms Powell,

This is a follow up to our telephone conversation on February 20, 1991 concerning Westfield Tanning Company becoming active as a small quantity generator of hazardous waste. This hazardous waste is spent butyl which is a waterproofing compound for leather soles. This product is classified as a hazardous waste due to the flash point being below 140°F.

If there is additional information you may need or if you have any questions please do not hesitate to call.

Sincerely,

WESTFIELD TANNING COMPANY

Keith A. Kraus  
Environmental Manager

KAK:bb